

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DAMILARE SONOIKI,
Plaintiff,

v.

HARVARD UNIVERSITY, HARVARD
UNIVERSITY BOARD OF OVERSEERS,
and THE PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,
Defendants.

Civil Action No. 1:19-cv-12172

**UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES IN MEMORANDUM
OF LAW IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Rule 7.1(b)(4), Defendants Harvard University, Harvard University Board of Overseers and The President and Fellows of Harvard College (collectively, “Harvard”¹) respectfully request leave of Court to file, on or before the deadline of May 31, 2023, a Memorandum of Law in support of its Motion for Summary Judgment that is thirty-five pages. As this Court knows, this case has an extensive procedural history and Plaintiff’s Amended Complaint includes five distinct breach of contract theories against Harvard. An additional fifteen pages will enable Harvard to adequately address the relevant factual background and raise pertinent arguments with respect to each of those five theories of breach, as well as the damages Plaintiff seeks in this case. Harvard respectfully submits that the additional pages it seeks will facilitate the Court’s consideration of Harvard’s forthcoming Motion for Summary Judgment. Moreover, counsel for Harvard has conferred with Plaintiff’s counsel, who indicated that Plaintiff assents to this motion.

¹ The Amended Complaint incorrectly identifies the Harvard entities as “Harvard University, Harvard University Board of Overseers, and the [sic] President and Fellows of Harvard College.” President and Fellows of Harvard College is the legal entity for Harvard and is the only proper party to this litigation

WHEREFORE, Harvard respectfully requests that this Court grant it leave to file a thirty-five-page Memorandum of Law in Support of its Motion for Summary Judgment on or before May 31, 2023.

Dated: May 25, 2023

Respectfully submitted,

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE
BY ITS ATTORNEYS,

/s/ *Rebecca M. O'Brien*

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*Attorneys for Defendants,
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Fellows of Harvard College*

CERTIFICATE OF COMPLIANCE WITH RULES 7.1 AND 37.1

Undersigned counsel hereby certifies that counsel for Harvard conferred with counsel for Mr. Sonoiki on May 24-25, 2023, who indicated that Plaintiff assents to the relief requested herein.

/s/ *Rebecca M. O'Brien*

Rebecca M. O'Brien

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 25, 2023.

/s/ *Rebecca M. O'Brien*

Rebecca M. O'Brien